

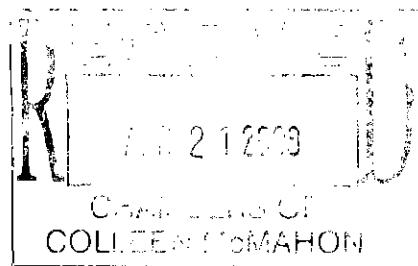


ATLANTA CINCINNATI COLUMBUS NEW YORK
BRUSSELS CLEVELAND DAYTON WASHINGTON, D.C.

April 21, 2008

BY FACSIMILE

The Honorable Colleen McMahon
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007



MEMO ENDORSED

RE: *Bibi de Malmanche vs. Glenrock Inc., et al.*, Civil Action No. 07-10940 (CM)(KNF)

Dear Judge McMahon:

We represent the plaintiff, Bibi de Malmanche, in connection with the above referenced matter. This letter is being filed on behalf of all parties to request modifications of the expert-related deadlines set forth in the January 23, 2008 Scheduling Order. Please note that the parties are not requesting an extension of the discovery cutoff deadline which is July 15, 2008.

Pursuant to the Scheduling Order, plaintiff's expert report is due no later than April 22, 2008. However, given the volume and location, overseas, of outstanding expert-related discovery, it will be impossible to meet this deadline. The parties seek a modification of the Scheduling Order that will (1) adjourn the date for plaintiff's expert report to May 13, 2008; (2) adjourn the date for the deposition of plaintiff's expert to June 2, 2008; (3) adjourn the date for defendants' expert report to June 13, 2008, (4) and adjourn the date for the deposition of defendants' expert to July 11, 2008. No such request has previously been made. A proposed Revised Scheduling Order is attached.

Very truly yours,

Jeanette Rodriguez-Morick

Enclosure

cc: Ross Hooper, Esq. (By Email)

Colleen McMahon
4/22/08

Jeanette.Rodriguez-Morick@ThompsonHine.com Phone 212.908.3971 Fax 212.344.6101

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THOMPSON HINE LLP
ATTORNEYS AT LAW

335 Madison Avenue
12th Floor
New York, New York 10017-4611

www.ThompsonHine.com
Phone 212.344.5100
Fax 212.344.6101

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FAX COVER PAGE

PAGES: 5 including cover

DATE: April 21, 2008

FROM: Jeanette Rodriguez-Morick
212.908.3971
jeanette.rodriguez-morick@ThompsonHine.com

TO: Judge Colleen McMahon FAX: (212) 805-6326

Problems with transmission? Call Jeanette Rodriguez-Morick at (212) 908-3971.

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ATTORNEYS AT LAW
A Limited Liability Partnership
including a Professional Corporation

335 Madison Avenue
12th Floor
New York, New York 10017-4611

www.ThompsonHine.com
Phone 212.344.5680
Fax 212.344.6101